

USSN: 10/810,065

Attorney Docket No.: 55752US019

Remarks

Claims 1, 7, 10, 11, 19-21, 26, 32, 34, 35, 40, 41, 43-45, 50, 51, 55-57 and 59-61 have been amended as shown above. Antecedent basis for the phrase "moving web substrate passing from an unwind reel to a takeup reel" may be found in the written description at, e.g., paragraphs 0003 and 0045. Following entry of this amendment, claims 1-61 will be pending in this application.

Applicant thanks the Examiner for extending to the undersigned attorney the courtesy of a telephonic interview on Wednesday, October 5, 2005. An amendment to replace the phrase "moving substrate of indefinite length" and the arguments set out below were discussed during the interview.

Objected-to claims 7, 10, 11, 19, 21, 32, 34, 35, 40, 43, 45, 55 and 59 have been rewritten in independent form so that they incorporate all the limitations of the base claim and any intervening claim. These claims and dependant claims 20, 22, 23, 41, 44, 46, 47, 56, 57, 60 and 61 should thus be allowable.

Entry of this amendment should require no new search or examination. Rejected claims 1-6, 8, 9, 12-18, 24-31, 33, 36-39, 41, 42, 48-54 and 58 should be allowable in view of the arguments set out below, and thus entry of this amendment could resolve all outstanding issues.

Rejection of Claims 1-6, 8, 9, 12-18, 24-31, 33,**36-39, 41, 42, 48-54 and 58 under 35 U.S.C. §102(b)**

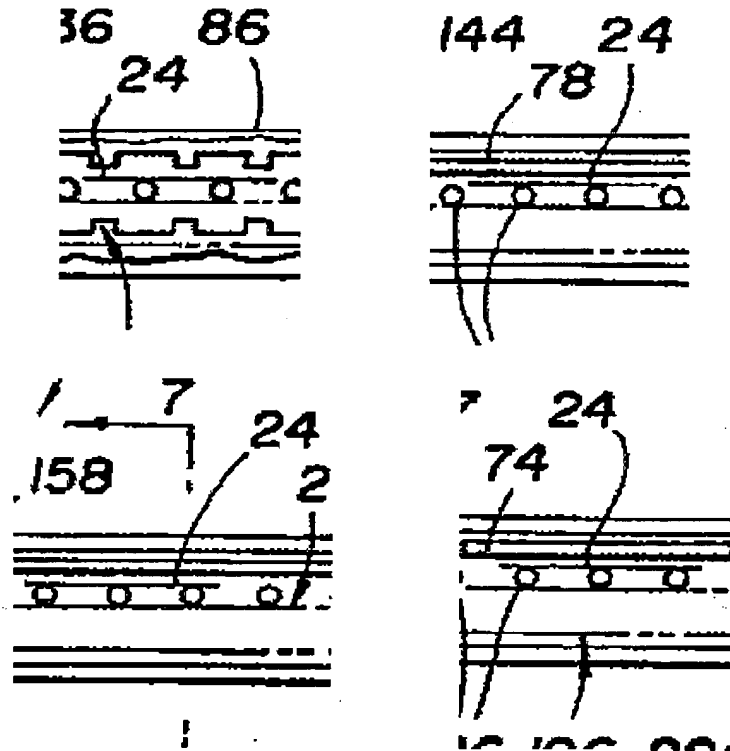
Claims 1-6, 8, 9, 12-18, 24-31, 33, 36-39, 41, 42, 48-54 and 58 were rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,536,333 (Foote et al.), on grounds set out at pages 3-5 of the Final Rejection, and on the further grounds that:

"The applicant argues that Foote et al. do not carry out a dry converting operation on a "moving substrate of indefinite length". The examiner disagrees as claims in a pending application should be given their broadest reasonable interpretation. As can be seen from figure 6 the sheets used vary in length. Consequently, the examiner does not believe that it is unreasonable for the reference to read on the claim limitations." (See the Final Rejection at page 2, first paragraph).

USSN: 10/810,065

Attorney Docket No.: 55752US019

Reconsideration is requested. The sheets 24 in Foote et al. Fig. 6 all appear to have the same length, as may be seen by inspecting 200% blow-ups of these portions of Fig. 6 in which a sheet 24 is depicted:

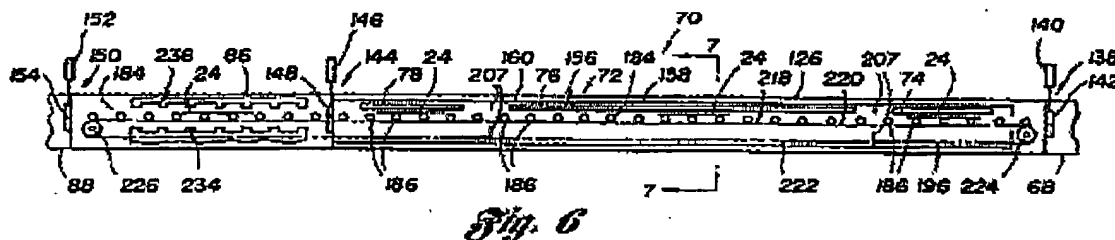


See also Fig. 2 and the text at col. 6, lines 39-41, which confirms that the illustrated sheets are 120 cm long.

In any event, Foote et al. do not show a process or apparatus for converting a “moving web substrate passing from an unwind reel to a takeup reel” as recited in rejected claims 1-6, 8, 9, 12-18, 24-31, 33, 36-39, 41, 42, 48-54 and 58. Foote et al. coat discrete glass sheets 24 while sealing them inside deposition station 70 using valves 138 and 144:

USSN: 10/810,065

Attorney Docket No.: 55752US019

*Fig. 6*

Foote et al. do not address (and are not germane to) the difficulties posed when converting a moving web. Applicant accordingly requests withdrawal of the 35 U.S.C. §102(b) rejection of claims 1-6, 8, 9, 12-18, 24-31, 33, 36-39, 41, 42, 48-54 and 58 as being anticipated by Foote et al.

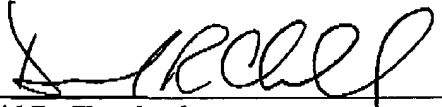
Conclusion

Foote et al. do not convert a moving web substrate passing from an unwind reel to a takeup reel. The rejected claims are not anticipated and should be in condition for allowance. The Examiner is encouraged to telephone the undersigned attorney at 612-331-7412 if there are any unanswered questions concerning this application.

Respectfully submitted on behalf of
3M Innovative Properties Co.,

October 14, 2005

IPLM Group, P.A.
P.O. Box 18455
Minneapolis, MN 55418


David R. Cleveland
Registration No: 29,524
612-331-7412 (telephone)
612-331-7401 (facsimile)

All correspondence regarding this application should be directed to:

Brian E. Szymanski
Office of Intellectual Property Counsel
3M Innovative Properties Company
P.O. Box 33427
St. Paul, Minnesota 55133-3427
Telephone: (651) 737-9138
Facsimile: (651) 736-3833